
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Hon. Joseph A. Dickson
v.	:	
	:	Mag. No. 12-6673
CHRISTINA NUNEZ,	:	
and	:	CRIMINAL COMPLAINT
LUIS A. VEGA	:	

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

COUNT ONE

From at least as early as in or around October 2010 through on or about August 24, 2012, in Hudson County, in the District of New Jersey and elsewhere, defendants CHRISTINA NUNEZ and LUIS A. VEGA did:

SEE ATTACHMENT A

COUNT TWO

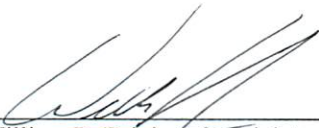
From at least as early as in or around October 2010 through on or about August 24, 2012, in Hudson County, in the District of New Jersey and elsewhere, defendant CHRISTINA NUNEZ did:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.


William P. Brinker, Special Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
August 27, 2012, at Newark, New Jersey

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

Attachment A

COUNT ONE

knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing cocaine, a Schedule II narcotic drug controlled substance, contrary to Title 21, United States Code, Section 841(a) and (b)(1)(B),

in violation of Title 21, United States Code, Section 846.

COUNT TWO

being a Postal Service officer and employee, embezzle any letter, postal card, package, bag, and mail, and any article or thing contained therein entrusted to her or which came into her possession intended to be conveyed by mail, carried or delivered by any carrier, messenger, agent, and other person employed in any department of the Postal Service, and forwarded through or delivered from any post office or station thereof established by authority of the Postmaster General or of the Postal Service; and did steal, abstract, and remove from any such letter, package, bag, and mail, any article or thing contained therein,

in violation of Title 18, United States Code, Section 1709.

Attachment B

I, William P. Brinker, am a Special Agent with the Drug Enforcement Administration. I have knowledge of the following facts based upon my investigation, review of reports and discussions with other law enforcement personnel and others. All statements herein are set forth in substance and in part:

1. On or about February 1, 2011, inspectors with the United States Postal Inspection Service lawfully seized approximately 1,569 grams of cocaine from an express mail package that was addressed to "Linda Schwartz" at "5,000 Riverside Station Blvd., Secaucus, NJ, 07094". That package was supposed to be delivered by defendant CHRISTINA NUNEZ, who is an employee of the United States Postal Service assigned to the post office in Secaucus, Hudson County, New Jersey. Subsequent investigation revealed that, prior to the seizure, dating back to October 2010, packages with similar weight and sequential tracking numbers, were sent from approximately three locations in Puerto Rico and supposedly delivered by CHRISTINA NUNEZ to non-existent, false, or inaccurate addresses along CHRISTINA NUNEZ's mail route. However, after the February 1, 2011 seizure, the drug trafficking organization ceased sending packages for approximately nine months.

2. In or around December 2011, law enforcement discovered that several packages, similar in nature to the package seized on February 1, 2011 and other packages related to the investigation, once again, were being sent from Puerto Rico to addresses that would be assigned to CHRISTINA NUNEZ's mail route. A closer inspection of the packages revealed that the addressees on the packages were not associated with the delivery addresses on the packages, meaning that the recipient's name did not match the delivery address.

3. Further investigation by law enforcement revealed that, between in or around February 2011 and in or around May 2012, at least four packages suspected of containing controlled substances were mailed to LUIS A. VEGA's former residence in Jersey City, Hudson County, New Jersey. Although LUIS A. VEGA currently resides with CHRISTINA NUNEZ in Lyndhurst, Bergen County, New Jersey, LUIS A. VEGA's family members still reside at his former address in Jersey City, New Jersey.

4. From in or around February 2012 until in or around early May 2012, CHRISTINA NUNEZ was on medical leave from the United States Postal Service. During that time, CHRISTINA NUNEZ received packages suspected of containing narcotics at her residence in Lyndhurst, New Jersey.

5. On or about August 22, 2012, law enforcement learned that a suspicious package similar to other packages involved in the investigation was en route from Dorado, Puerto Rico, a location from which other suspicious packages in the instant investigation were mailed. Once the package arrived at the United States Postal Service Express Mail Facility in Kearny, New Jersey, law enforcement noted that the delivery address on the package would be assigned to CHRISTINA NUNEZ's mail route. Thereafter, a trained law enforcement narcotics detection canine who is a certified controlled substances detecting dog alerted law enforcement to the

presence of a controlled substance in the package. Pursuant to a search warrant, law enforcement opened the package and discovered another box that contained plastic wrapping with coffee, and inside the bag with coffee was more plastic wrapping that contained a white powdery substance. The white powdery substance field-tested positive for cocaine and weighed approximately 600 grams. The cocaine was seized and replaced with sham, which is similar in appearance to the contents of the package. The package was placed back into circulation for delivery.

6. On or about August 24, 2012, while conducting physical surveillance and lawfully monitoring the inside of CHRISTINA NUNEZ's mail truck via video as well as the package itself via a GPS tracking device, law enforcement learned that CHRISTINA NUNEZ failed to deliver the package to its delivery address. At the end of her shift, CHRISTINA NUNEZ returned to her residence in Lyndhurst, New Jersey with the package.

7. Thereafter, on the same day, CHRISTINA NUNEZ and LUIS A. VEGA were arrested in Lyndhurst, New Jersey. CHRISTINA NUNEZ waived her Miranda rights and admitted to the following: (a) since October 2010, she has been receiving packages that she knew contained controlled substances on behalf of a drug trafficking organization in Puerto Rico; (b) after the packages were mailed to addresses on her mail route, she would intercept the packages, scan them as delivered and fail to actually deliver the packages to their delivery addresses; (c) upon receipt, she delivered the packages to co-conspirators in Camden, New Jersey; (d) she was paid approximately \$500 to \$600 for receiving each drug-laden package; (e) she was supposed to intercept and deliver the package that was seized on February 1, 2011 (which contained approximately 1,569 grams of cocaine); (f) she received packages that she knew contained controlled substances at her residence on behalf of the drug trafficking organization; and (g) LUIS A. VEGA received packages of narcotics at his former residence in Jersey City, New Jersey on her behalf.

8. LUIS A. VEGA also waived his Miranda rights and admitted that, since December 2011, he had received approximately four or five packages on CHRISTINA NUNEZ's behalf, several of which were mailed to his former residence in Jersey City, New Jersey, and he knew that the packages contained controlled substances. In addition, LUIS A. VEGA informed law enforcement that he occasionally accompanied CHRISTINA NUNEZ when she delivered the drug-filled packages to co-conspirators in Camden, New Jersey.

9. Based upon the investigation to date, it is estimated that the conspiracy involved the distribution in excess of 18 kilograms of cocaine.